E-FILED; Frederick Circuit Court

Docket: 8/12/2022 2:50 PM; Submission: 8/12/2022 2:50 PM

STATE OF MARYLAND \* CRIMINAL NO. C-10-CR-21-000535

VS \* IN THE CIRCUIT COURT FOR

NORRIS BERNARD ELLIS \* FREDERICK COUNTY, MARYLAND

\*

## STATE'S ANSWER TO DEFENDANT'S PRO SE MOTION FOR TRANSFER OF TRIAL FROM FREDERICK COUNTY TO MONTGOMERY COUNTY

COMES NOW the State of Maryland, by Tammy M. Leache, Assistant State's Attorney for Frederick County, Maryland, and hereby files the following response to the Defendant's Motion and states as follows:

- 1. This Motion was filed pro se by the Defendant without his attorney of record having knowledge that he filed.
- 2. Defense Counsel filed a similar motion on December 29, 2021 requesting this matter be transferred to Montgomery County, which was denied on January 3, 2022 by Judge Solt.

WHEREFORE, the State the opposes the Defendant's Pro Se Motion in all respects and respectfully requests this Honorable Court to deny the Defendant's Motion without a hearing.

<u>Tammy M. Leache /s/</u> TAMMY M. LEACHE

ASSISTANT STATE'S ATTORNEY FOR FREDERICK COUNTY, MARYLAND

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FrederickSAOCircuit@FrederickCountyMD.gov

**CERTIFICATE OF SERVICE** 

I HEREBY CERTIFY that on this 12th day of August, 2022, a copy of the foregoing

State's Answer to Defendant's Pro Se Motion to Transfer from Frederick County was sent via

MDEC and/or Sharefile/Citrix, a secure file sharing service, to the designated e-mail address

and/or service contact for Isabelle Raquin, Esquire, Attorney for Defendant and that a copy was

mailed, postage pre-paid, to Norris Ellis, FCADC, 7300 Marcie's Choice Lane, Frederick, MD

21704.

Tammy M. Leache /s/
TAMMY M/LEACHE

ASSISTANT STATE'S ATTORNEY